

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

POWERTRAIN, INC., A MISSISSIPPI CORPORATION	PLAINTIFF
VS.	CIVIL ACTION NO. 1:11-cv-000105-SA-DA
JOYCE MA, INDVIDUALLY, AND BEST MACHINERY & ELECTRICAL, INC.	DEFENDANTS
JOYCE MA, INDVIDUALLY	COUNTER- PLAINTIFF
VS.	
POWERTRAIN, INC., A MISSISSIPPI CORPORATION	COUNTER- DEFENDANT
JOYCE MA, INDVIDUALLY	THIRD-PARTY PLAINTIFF
VS.	
WILLIAM H. SHAWN, An Individual, and SHAWNCOULSON, LLP, a Washington, DC Limited Liability Partnership	THIRD-PARTY DEFENDANTS

**DEFENDANT JOYCE MA'S OPPOSITION TO THE RULE 15(a)
MOTION FOR LEAVE TO AMEND FILED BY PLAINTIFF
POWERTRAIN, INC.**

COMES NOW, Defendant, Joyce Ma, the individual (“Ma”), and files her Opposition to Plaintiff Powertrain Inc.’s Rule 15(a) Motion for Leave to Amend the Complaint. Ma has attached her Points and Authorities in Support of this Opposition.

WHEREFORE, Ma respectfully requests the Court to deny Plaintiff Powertrain Inc.’s Rule 15(a) Motion for Leave to Amend the Complaint. Alternatively, Ma respectfully requests the Court to allow sufficient time, comparable to the time allowed for Ma to discover the cause of action of breach of contract, for Ma to perform adequate discovery for the vastly expanded scope of this lawsuit.

Dated: November 26, 2012

Respectfully Submitted,

JOYCE MA
DEFENDANT/THIRD PARTY PLAINTIFF

By /s/ Jeffery M. Navarro
JEFFERY M. NAVARRO
P.O. BOX 162
AMORY, MS 38821
662-256-3706
MBN: 3755
Attorney for Defendant/Third Party Plaintiff,
Joyce Ma

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Jeffery M. Navarro
Jeffery M. Navarro